



PRACTICE WITH PURPOSE

May 30, 2014

Via Electronic Filing

Hon. Andrew S. Hanen
United States District Court
US Courthouse
600 East Harrison, Suite 101
Brownsville, Texas 78520-7114

Re: Cause No. B-08-446; *United States of America, ex rel. vs. Valley Baptist Health System and Valley Baptist Medical Center* in the United States District Court for the Southern District of Texas Brownsville Division

Dear Judge Hanen:

In follow-up to the status conference call on Wednesday, April 30, 2014, and this Court's Amended Scheduling Order signed April 30, 2014, this letter provides the Court with notice of the parties' agreement relating to the other scheduling order deadlines:

3. The plaintiff's experts will be named with a report furnished by: Completed
4. The defendant's experts must be named with a report furnished by: May 30, 2014
5. Discovery must be completed by: September 1, 2014

Counsel may agree to continue discovery beyond the deadline, but there will be no intervention by the Court.

No Continuance will be granted because of information acquired in post-deadline discovery.

Additionally, the parties have agreed to the filing of an "early" motion for summary judgment on the issue of recoverable damages and have agreed on the following briefing schedule:

- Defendant's motion for summary judgment on recoverable damages: on or before May 30, 2014.
- Plaintiff's response to Defendant's motion: within 20 days of Defendant's filing of the motion.
- Defendant's reply to Plaintiff's response: within 10 days of Plaintiff's filing of the response.
- Plaintiff's sur-reply to Defendant's reply: within 10 days of Defendant's filing of the reply

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If you have any questions, please do not hesitate to contact us. Thank you.

Sincerely,

/s/ Matthew S. Veech
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And

/s/ Edward W. Allred
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